## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| X  |                             |
|--|-----------------------------|
| DIONNE LEE                                       |                             |
| Plaintiff  |                             |
| RICHARD K. BAWUAH and<br>COWAN EQUIPMENT LEASING | Civil Action No. 07-cv-9917 |
| Defendants<br>X                                  |                             |
| 71   |                             |

## <u>MOTION IN LIMINE TO PRECLUDE PLAINTIFF'S WAGE LOSS CLAIM</u>

PLEASE TAKE NOTICE that on the \_\_\_ day of \_\_\_\_\_\_\_, 2008, at 9:30 a.m., or as soon thereafter as counsel may be heard, the undersigned shall apply to the Honorable Andrew J. Peck, U.S.M.J. at the United States District Court, Southern District of New York, located at the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York City, New York 10007-1312 on behalf of Defendants, Richard K. Bawuah and Cowan Equipment Leasing in the above-captioned matter for an Order Precluding Plaintiff, Dionne Lee's Wage Loss Claim at the Time of Trial in this matter.

The moving defendants shall rely on the annexed Certification of Counsel, Exhibits and Legal Brief in support of this Notice of Motion.

## PLEASE TAKE FURTHER NOTICE oral argument is requested.

Date: New York, New York

July 3, 2008

Yours, etc.,

**RAWLE & HENDERSON LLP** 

By: \_\_\_\_\_

Jeffrey A. Segal

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File No. 801,840

To: Winston B. Rouse, Esquire 901 Sheridan Avenue Bronx, NY 10451